

## **Exhibit B**

-----Original Message-----

From: Russell J. Pope <[rjpopetph-law.com](mailto:rjpopetph-law.com)>  
To: Paul Grobman <[grobtown@aol.com](mailto:grobtown@aol.com)>; Douglas B. Riley <[dbriley@tph-law.com](mailto:dbriley@tph-law.com)>  
Cc: LBROWN <[LBROWN@gallaghersharp.com](mailto:LBROWN@gallaghersharp.com)>; rdd <[rdd@lsrlaw.com](mailto:rdd@lsrlaw.com)>; Cynthia.Fischer <[Cynthia.Fischer@lsrlaw.com](mailto:Cynthia.Fischer@lsrlaw.com)>  
Sent: Fri, Jun 19, 2015 2:11 pm  
Subject: RE: Kline

Dear Paul:

Attached are excerpted pages from the two attachments referenced in the Trustee Certification dated December 31, 2004 (Bates WFB0484-0485). There were over 10,000 loans in this Trust and creating these excerpts that display all references to the Kline loans was preferable to redacting hundreds of pages from the original spreadsheets. In the second file, you will need to print all three legal-sized pages and then lay them side by side to see how they are displayed in the original spreadsheet. Putting all the data on one page rendered the size of the type virtually illegible.

With regard to the five reasons Mr. Gorrien described for which a release of custodial records could be requested, I refer you to Exhibit I to the PSA, which was previously produced, at Bates page WFB0424.

I did not note any further document requests from you in regard to the other two deponents.

Turning now to your delinquent responses to our discovery requests, I ask again that you provide: (1) the original second mortgage instrument (that was returned to Mr. Kline), which has been the subject of repeated requests over the past several months; and (2) the response you previously represented would be provided to me not later than June 8, setting forth the categories of damages, the itemized amount of damages in each category, and your documentary support for all damages. These requests pertain to both Kline individually as well as to the putative class.

You asked that I inform you of any intention to actually file the motion to compel discovery that was disclosed to you in prior email and telephone exchanges. In reply, I am giving you notice that I will file the motion before the status conference on Monday if I do not receive full and satisfactory disclosure of all requested information on damages before 9:00 am on Monday.

Finally, with the exception of 11:30 – 1:30, I am free on Monday for a call to discuss scheduling.

Russ

Russell J. Pope  
**Treanor Pope & Hughes, P.A.**  
500 York Road  
Towson, Maryland 21204  
(410) 494-7777 | (410) 494-1658 (fax)  
[www.tph-law.com](http://www.tph-law.com)

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**From:** Paul Grobman [<mailto:grobtown@aol.com>]  
**Sent:** Thursday, June 18, 2015 4:51 PM  
**To:** Douglas B. Riley; Russell J. Pope  
**Cc:** [LBROWN@gallaghersharp.com](mailto:LBROWN@gallaghersharp.com); [rdd@lsrlaw.com](mailto:rdd@lsrlaw.com); [Cynthia.Fischer@lsrlaw.com](mailto:Cynthia.Fischer@lsrlaw.com)  
**Subject:** Kline

Dear Russ and Doug,

Can you please advise me as to the status of the additional documents requested by plaintiff based on information disclosed by Mr. Gorrien and the other witnesses during last week's depositions.

Sincerely,

Paul

## mlmi 2004-wmnc5 final cert ex report 12-31-04

Collateral ID	Borrower Name/Prod ID	Group	Alternate Loan Number	Description	Execution Date/Notation	Loan Amount	Category	Address	City	State	ZIn	Trust Number	Business Date/Open Date	Comments Since UDR Chrt	UDR Chrt
1095426	KLINE EUGENE 2004WMC5	WMNC5040706	J22104670	SECI	02	160,000.00	Document is Copy, Need Original	902 ASHCROFT, CANTERVILLE	OH	45458	07/19/2004 CR	WMNC5040706-35p1	114		
1095426	KLINE EUGENE 2004WMC5	WMNC5040706	J22104688	SECI	300	160,000.00	Evidence of file received, needs title pol 160,000.00	902 ASHCROFT, CANTERVILLE	OH	45458	07/19/2004 CR	WMNC5040706-35p1	114		
1095427	KLINE EUGENE 2004WMC5	WMNC5040706	J22104688	SECI	02	30,000.00	Document is Copy, Need Original	902 ASHCROFT, CANTERVILLE	OH	45458	07/19/2004 CR	WMNC5040706-15p1	114		
1095427	KLINE EUGENE 2004WMC5	WMNC5040706	J22104688	TRUL	300	30,000.00	Evidence of file received, needs title pol 30,000.00	902 ASHCROFT, CANTERVILLE	OH	45458	07/19/2004 CR	WMNC5040706-35p1	114		

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<u>CollateralID</u>	<u>Pool</u>	<u>Borrower Name</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>Zip</u>	<u>Loan Amount</u>	<u>PI</u>	<u>Rate</u>	<u>Closedate</u>	<u>Firstdate</u>	<u>Maturity</u>	<u>Casenum</u>	<u>Group</u>	
10995426	2004 WMCS	KLINE EUGENI	902 ASHCREEK	CENTERVILLE	OH	45458	160,000.00		1,010.26		6.490	06/18/2004	08/01/2004	07/01/2034	WMCM040706
10995427	2004 WMCS	KLINE EUGENI	902 ASHCREEK	CENTERVILLE	OH	45458	30,000.00	328.93		12.875	06/18/2004	08/01/2004	07/01/2019	WMCM040706	

WFB 0487

Trust Number	Exist Status	Code	Active	Investor ID	Amadj	Amcony	Amround	Ammargin	Amfloor	Amindex rate	Annrep	Lifecap	UPB	MOM
WMCM2004-35p1 OH	A	A		322104670	10995426	07/01/2006	0				5.125	7.990	1.000	
WMCM2004-35p1 OH	A	A		322104688	10995427		0							N N

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<u>Mersmin Ctrnum</u>	<u>Stage</u>	<u>UDF Char1</u>	<u>UDF Char2</u>
4-WMC5	CR		
4-WMC5	CR		